The examiner rejected the independent Claims 1 and 12 as being anticipated by Hoelen. It is respectfully submitted that the examiner is not placing sufficient importance on the claimed iterative process for arranging LEDs, which results in a non-symmetrical arrangement of LEDs of at least three colors. It is the iterative process that improves the color uniformity in the set of LEDs. The examiner has not cited any art that suggests that an iterative process was used to determine the arrangement of LEDs. The iterative process generates a non-predetermined arrangement of LEDs, while the prior art arrangements are predetermined. Applicants' method and resulting LED arrangements optimize the color uniformity, while the prior art arrangements compromise the color uniformity by requiring predetermined arrangements.

The enclosed declaration by one of the inventors explains the invention and emphasizes the importance of the iterative process to the improved color uniformity.

It is respectfully requested that any further rejection of the claims, if any, address why the examiner believes the prior art uses the claimed iterative process in determining the arrangement of LEDs.

The examiner is invited to call Applicant's attorney at 408-382-0480 x202 for further discussion.

Certification of Facsimile Transmission

I hereby certify that this paper is being facsimile transmitted to the U.S. Patent and Trademark Office on the date shown below.

Signature

11/27/06 Date

Respectfully submitted,

Brian D. Ogonowsky Attorney for Applicant(s)

Reg. No. 31,988

Patent Law Group LLP 2635 North First St. Suite 223 San Jose, CA 95134 (408) 382-0480 FAX (408) 382-0481

Serial No. 10/810,169